

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**PERSONAL INJURY PLAINTIFFS' MASTER
SHORT FORM COMPLAINT AND JURY TRIAL DEMAND**

Plaintiff incorporates by reference the First Amended Master Long Form Complaint and Jury Trial Demand filed in *In re: Intercontinental Terminals Company, LLC Deer Park Fire Litigation*, on March 12, 2021. Pursuant to the Court's January 15, 2021 Order, Doc. 550, this Short Form Complaint adopts the allegations, claims, and requested relief as set forth in the First Amended Master Long Form Complaint.

Plaintiffs further allege as follows:

I. DEFENDANTS.

Plaintiffs name the following Defendants in this action:

X Intercontinental Terminals Company, LLC

X NSK Ltd.

X NSK Corporation

II. PLAINTIFFS.

Name of Plaintiff:

1. Plaintiff Toni Richardson is an individual residing in Houston, Harris County, Texas, a citizen of Texas.

2. III. INJURIES.

Plaintiff alleges the following injuries as a result of the March 17, 2019 fire and subsequent reignitions of the fire at ITC's Deer Park Facility:

Toni Richardson – smoke inhalation, coughing, headaches, nausea, dizziness, lethargy, shortness of breath, sweating, vomiting, disease of the nasal canal/sinus, exposure to benzene, hearing loss, ear discharge, cancerous legions in her mammary glands, chest pain, irritated throat, and extreme fatigue. Plaintiff also suffered from emotional distress and property damage.

IV. CAUSES OF ACTION.

Plaintiff adopts in this Short Form Complaint the following claims asserted in the Master Long Form Complaint and Jury Trial Demand, and the allegations with regard thereto as set forth in the Master Long Form Complaint and Jury Trial Demand:

X Count I - Negligence and Gross Negligence (ITC)

X Count II.A - Products Liability - Manufacturing Defect (NSK Defendants)

X Count II.B - Products Liability - Design Defect (NSK Defendants)

WHEREFORE, Plaintiff prays for relief and judgment against Defendants and all such further relief that this Court deems equitable and just as set forth in the Amended Master Long Form Complaint and Jury Demand and any additional relief to which Plaintiffs may be entitled.

Dated: July 6, 2022

Respectfully submitted,

Houssiere, Durant & Houssiere, LLP

By: /s/ Charles R. Houssiere, III

Charles R. Houssiere, III

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that on July 6, 2022, a copy of this document has been served on all counsel of record in the above-captioned cases by electronic mail.

/s/ Charles R. Houssiere, III